

Carl R. Soller
Meichelle R. MacGregor
Cowan, Liebowitz & Latman, P.C.
1133 Avenue of the Americas
New York, NY 10036
212-790-9200
Attorneys for Defendant
JDB International Inc.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

SHIPCO TRANSPORT, INC.,	:	09 cv 9532 (CM)
<i>Plaintiff,</i>	:	ECF CASE
<i>-against-</i>	:	NOTICE OF MOTION
JDB INTERNATIONAL INC. and	:	Hon. Colleen McMahon
LAPTON FREIGHT INTERNATIONAL	:	
LIMITED,	:	
<i>Defendants.</i>	:	

-----X

PLEASE TAKE NOTICE that, upon the Affirmation of Carl R. Soller, Esq., dated April 14, 2011, the exhibits annexed thereto, the accompanying Memorandum of Law and all other papers, pleadings and proceedings in this action, Cowan, Liebowitz & Latman, P.C., counsel for Defendant JDB International Inc. ("JDB"), will move this Court, before the Hon. Colleen McMahon, United States District Judge, at the United States Courthouse, 500 Pearl Street, New York, New York, for an order, pursuant to Rule 1.4 of the Local Rules of the United States District Court for the Southern District of New York permitting Cowan, Liebowitz & Latman, P.C. to withdraw as counsel of record for JDB and granting such other and further relief

as the Court deems just and appropriate.

Dated: New York, New York
April 14, 2011

Respectfully submitted,

COWAN, LIEBOWITZ & LATMAN, P.C.

By: /Carl R. Soller/
Carl R. Soller (crs@cjl.com)
Meichelle R. MacGregor (mrn@cjl.com)
Don M. Obert (dmo@cjl.com)
1133 Avenue of the Americas
New York, NY 10036
(212) 790-9200
Attorneys for Defendant

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 14, 2011, a true copy of the foregoing Notice of Motion was served via ECF on all counsel of record and via first class mail postage prepaid on defendant, JDB International Inc., addressed as follows: Karen Ambrosia, JDB International Inc., 780-A Apex Road, Sarasota, Florida 34240.

Dated: April 14, 2011
New York, New York

/Meichelle R. MacGregor/
Meichelle R. MacGregor